

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:****FREE SPEECH SYSTEMS, LLC,****DEBTOR.**§  
§  
§  
§  
§  
§**Case No. 22--60043****(Subchapter V Debtor)  
Chapter 11**

**WITNESS AND EXHIBIT LIST  
FOR HEARINGS ON JANUARY 20, 2023**

Judge:	Hon. Christopher M. Lopez
Hearing Date:	Friday January 20, 2023
Hearing Time:	11:00 a.m. (CT)
Party's Name:	Free Speech Systems, LLC
Attorney's Name:	Raymond W. Battaglia,
Attorney's Phone:	(210) 601-9405;
Nature of Proceeding:	Hearing on: <ul style="list-style-type: none"> <li>• Motion to Authorize the Use of Cash Collateral [Docket No. 6]</li> </ul>

The Law Offices of Raymond W. Battaglia (the “**Battaglia Firm**”), bankruptcy counsel for Free Speech Systems, LLC (the “**Debtor**”) in the above-captioned chapter 11 case (the “**Chapter 11 Case**”), hereby submit this witness and exhibit list in connection with the hearings to be held on Friday January 20, 2023, at 11:00 A.M. (Central Time) (the “**Hearing**”) on the

**WITNESSES**

The Debtor may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. Patrick Magill, Chief Restructuring Officer of Free Speech Systems, LLC;
2. Any witnesses necessary to establish notice of the Hearing has been provided; and
3. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other parties.

**EXHIBITS**

The Debtor may offer for admission into evidence any of the following exhibits at the hearing:

<b>Ex.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted /Not Admitted</b>	<b>Disposition</b>
1	4-Week Cash Collateral Budget				

The Debtor reserves the right to supplement, amend or delete any witness and exhibits prior to the Hearing. The Debtor also reserves the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Debtor finally reserves the right to introduce exhibits previously admitted.

Respectfully submitted January 18, 2023.

LAW OFFICES OF RAY BATTAGLIA, PLLC

/s/ RAYMOND W. BATTAGLIA  
Raymond W. Battaglia  
State Bar No. 01918055  
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66 Granburg Circle  
San Antonio, Texas 78218  
Tel. (210) 601-9405

*Counsel to the Debtor and Debtor-In-Possession*

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system.

/s/ Raymond W. Battaglia  
Raymond W. Battaglia

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11 (Subchapter V)
FREE SPEECH SYSTEMS, LLC,	)	
	)	Case No. 22-60043 (CML)
Debtor.	)	
	)	

In re:	)	
	)	Chapter 11
ALEXANDER E. JONES,	)	
	)	Case No. 22-33553 (CML)
Debtor.	)	
	)	

**THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS' WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED FOR  
JANUARY 20, 2023, AT 11:00 A.M. (CST)**

The Official Committee of Unsecured Creditors of Alexander E. Jones (the "Committee") appointed in the chapter 11 case of *Alexander E. Jones*, Case No. 22-33553 (CML), respectfully files its Witness and Exhibit List for the hearing of the above-captioned chapter 11 cases to be held on January 20, 2023, at 11:00 A.M. (Central Standard Time) and that may be adjourned or continued from time to time by the Court (the "Hearing") as follows:

**WITNESSES**

The Committee may call the following witnesses at the Hearing:

1. Any witness listed or called by any other party;
2. Rebuttal witnesses as necessary; and
3. The Committee reserves the right to cross-examine any witness called by any other party.

The Committee does not presently intend to offer testimony from any witness, but reserves the right to do so. The Committee reserves the rights to cross-examine any witness identified by any other party and to call any other party's witness as a rebuttal witness.

### **EXHIBITS**

The Committee may offer into evidence one or more the following exhibits at the Hearing:

1. Any document or pleading filed in the above-captioned case;
2. Any exhibit necessary for impeachment and/or rebuttal purposes; and
3. Any exhibit identified or offered by any other party.

### **RESERVATION OF RIGHTS**

The Committee reserves all rights, including, but not limited to, the right to amend, revise, or supplement this witness and exhibit list at any time, to designate additional witnesses and exhibits, to call any person identified as a witness by any other party in interest or introduce any document identified as an exhibit by any other party in interest, and to offer additional witnesses and exhibits at the Hearing for purposes of impeachment, rebuttal, in response to witnesses and evidence offered by any other party, and for any other permissible purpose under the Federal Rules of Bankruptcy Procedure and the Federal Rules of Evidence.

*[The remainder of this page intentionally left blank.]*

Dated: January 18, 2023

Respectfully submitted,

By: /s/ David M. Zensky  
David M. Zensky

**AKIN GUMP STRAUSS HAUER & FELD LLP**

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*-and-*

Ira S. Dizengoff (admitted *pro hac vice*)  
David M. Zensky (admitted *pro hac vice*)  
Philip C. Dublin (admitted *pro hac vice*)  
Sara L. Brauner (admitted *pro hac vice*)  
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***Proposed Counsel to the Official Committee of  
Unsecured Creditors of Alexander E. Jones***

**CERTIFICATE OF SERVICE**

I certify that on January 18, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ David M. Zensky

David M. Zensky

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Case No. 22-60043</b>
	§	
<b>FREE SPEECH SYSTEMS, LLC</b>	§	<b>Chapter 11</b>
	§	
<b>Debtor</b>	§	

**UNITED STATES TRUSTEE'S WITNESS/EXHIBIT LIST**

Main Case No: 22-60043	Name of Debtor: Free Speech Systems, LLC
Witnesses:	
	Judge: <b>Christopher Lopez</b>
Any witness called by any other party	Hearing Date: January 20, 2023
	Hearing Time: 11:00 am
	Party's Name: United States Trustee
	Attorney's Name: Jayson B. Ruff
	Attorney's Phone: 202-573-6960

NATURE OF PROCEEDINGS: The Court is considering continued use of cash collateral and a motion to fix a date by which Debtor's contract with Alexander E. Jones is to be assumed.



**EXHIBITS**

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Any exhibit introduced by any other party				
2	Any exhibit identified or offered by any other party				

RESPECTFULLY SUBMITTED:  
KEVIN M. EPSTEIN  
UNITED STATES TRUSTEE

DATED: January 18, 2023

/s/ Jayson B. Ruff  
Jayson B. Ruff, Trial Attorney  
MI Bar #P69893  
United States Department of Justice  
Office of the United States Trustee  
515 Rusk Street, Suite 3516  
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Cell: 202-575-6960

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
FREE SPEECH SYSTEMS LLC,	§	Chapter 11 (Subchapter V)
.	§	
	§	Case No. 22-60043 (CML)
	§	
Debtor.	§	Jointly Administered

**WITNESS AND EXHIBIT LIST FOR HEARING  
SCHEDULED FOR JANUARY 20, 2023 AT 10:00 A.M. (PREVAILING CENTRAL TIME)**

The Subchapter V Trustee (the “Subchapter V Trustee”) file this Witness and Exhibit List for the hearing to be held on January 20, 2023, at 10:00 a.m. (prevailing Central Time) (the “Hearing”) as follows:

**WITNESSES**

The Subchapter V Trustee may call the following witnesses at the Hearing:

1. Any witness listed by any other party;
2. Rebuttal witnesses as necessary; and
3. The Subchapter V Trustee reserve the right to cross-examine any witness called by any other party.

**EXHIBITS**

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>MARK</b>	<b>OFFER</b>	<b>OBJECT</b>	<b>ADMIT</b>	<b>W/D</b>	<b>DISPO SITION AFTER TRIAL</b>	<b>Docket No.</b>
	Any document or pleading filed in the above-captioned main cases							
	Any exhibit necessary for impeachment and/or rebuttal purposes							
	Any exhibit identified or offered by any other party							

**RESERVATION OF RIGHTS**

The Subchapter V Trustee reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the Hearing.

Houston, Texas  
January 18, 2023

/s/ Elizabeth C. Freeman

**LAW OFFICE OF LIZ FREEMAN**

Elizabeth C. Freeman (TX Bar No. 2400922)

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Houston, TX 77208-1209

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Email: [liz@lizfreemanlaw.com](mailto:liz@lizfreemanlaw.com)

*Counsel for Melissa Haselden,  
Subchapter V Trustee*

**JACKSON WALKER LLP**

Sean Gallagher (TX Bar No. 24101781)

Emily Meraia (TX Bar No. 24129307)

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*Counsel for Melissa Haselden,  
Subchapter V Trustee*

**CERTIFICATE OF SERVICE**

I certify that on January 18, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Elizabeth Freeman

Elizabeth Freeman